

EXHIBIT 3

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David W. Slayton,
Executive Officer/Clerk of Court,
By S. Gardner, Deputy Clerk

Attorneys for Plaintiff Shawn Carter

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

SHAWN CARTER,

Plaintiff,

vs.

THE BUZBEE LAW FIRM,
ANTHONY G. BUZBEE,

Defendants.

Case No. 24SMCV05637

**DECLARATION OF JAMES BUTLER IN
SUPPORT OF PLAINTIFF SHAWN
CARTER'S EX PARTE APPLICATION
TO SUPPLEMENT THE RECORD OR
OBTAIN DISCOVERY IN CONNECTION
WITH DEFENDANTS' SPECIAL
MOTION TO STRIKE**

Judge: Hon. Mark H. Epstein
Location: Department I

Initial Hearing Date: February 25, 2025
Complaint Filed: November 18, 2024

DECLARATION OF JAMES BUTLER

I, James Butler, declare as follows:

1. I make this declaration in support of Plaintiff's Ex Parte Application in connection with Defendants' Special Motion To Strike. Unless otherwise noted, I have personal knowledge of the facts stated herein and, if called upon to testify, I could and would competently testify thereto. I am a private investigator. I was not hired by Plaintiff or Plaintiff's attorneys to perform the investigation I describe in this declaration.

2. On Friday, February 21, 2025, along with investigator Charlotte Henderson, I met with Plaintiff Jane Doe ("Ms. Doe"), the person on whose behalf Defendants filed the lawsuit captioned as *Jane Doe v. Sean Combs et al.*, Case No. 24-cv-07975, in the Southern District of New York on October 20, 2024 (the "lawsuit"). To protect Ms. Doe's privacy and identity, I am not disclosing here her name or any other facts that enabled me to conclude the woman I met was, in fact, Ms. Doe.

3. We met with Ms. Doe on the front porch of her home in Alabama. Ms. Doe confirmed that she was, in fact, the Jane Doe plaintiff in the lawsuit.

4. Ms. Doe, Ms. Henderson, and I were the only people present.

5. Throughout our discussion, Ms. Doe appeared calm and at ease. She maintained a natural demeanor and engaged in conversation freely.

6. Ms. Doe's body language, including her nodding, relaxed posture, and steady tone of voice, reinforced that she did not feel scared or intimidated during our interaction.

7. At no point during our interaction did Ms. Doe request to be left alone.

8. During our conversation, Ms. Doe told me, among other things, the following facts:

a. She saw an advertisement on Facebook for the AVA Law Group law firm concerning Sean Combs.

b. The AVA Law Group referred her to Defendant Tony Buzbee and his law firm.

c. Ms. Doe met Mr. Buzbee for the first time in Houston, Texas. He paid to fly her there. Their meeting to discuss the case took place when Ms. Doe flew out for an

1 interview that Mr. Buzbee had arranged for Ms. Doe to give to NBC News in Mr.
2 Buzbee's office.¹

3 d. Jane Doe stated to me that Mr. Carter did not sexually assault her.

4 e. Jane Doe stated to me that she originally told Mr. Buzbee that she had been
5 raped by Sean Combs and a world-renowned female celebrity was also present for the
6 assault, and that Mr. Buzbee suggested that she claim that Mr. Carter was another rapist.

7 f. Jane Doe stated "Buzbee brought Jay Z into it," and "he was the one that
8 kind of pushed me towards going forward with him, with Jay-Z."

9 g. Jane Doe said that Mr. Buzbee asked her if Mr. Carter had been at the party.
10 Ms. Doe told Mr. Buzbee that Mr. Carter was at the party but she told me that Mr. Carter
11 did not take part in any sexual assault of Ms. Doe.

12 h. Jane Doe confirmed the following regarding Mr. Carter during our
13 interview:

14 i. "Jay-Z had nothing to do with this, correct? Right."

15 ii. "Other than he was at the party that you were at. So I mean, he did not
16 assault you? No."

17 iii. "He was just there, but he didn't have anything to do with any sexual acts
18 towards you? Yeah."

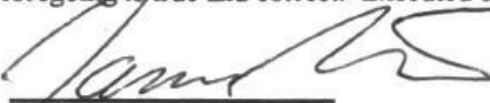
19 i. Jane Doe said to me that lawyers at Mr. Buzbee's law firm told her that, if
20 she pursued Mr. Carter, she would get a payout.

21 j. Ms. Doe said to me that, shortly before Mr. Buzbee dismissed the lawsuit
22 against Mr. Carter, Mr. Buzbee told Ms. Doe that Mr. Carter was threatening to kill her in
23 response to her lawsuit and could come after her. Upon hearing that, Ms. Doe agreed to
24 drop her case.

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26
27 ¹ I understand that NBC aired the interview on December 13, 2024 and that it was filmed on
28 December 11, 2024.

1 9. Ms. Doe stated four times that Mr. Carter did not assault her. After Ms. Doe had
2 voluntarily and consistently affirmed this, we inquired whether she would be open to signing an
3 affidavit reflecting what she had told us. She responded by saying “but how does this help me?”
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5 I declare under penalty of perjury under the laws of the State of California that the
6 foregoing is true and correct. Executed on this 4th day of March 2025, at Bradenton FL.

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